Statement of Basis of the Federal Operating Permit

Public Service Company of Oklahoma

Site Name: Oklaunion Power Station Physical Location: 12567 FM 3430 Nearest City: Vernon County: Wilbarger

> Permit Number: O38 Project Type: Renewal

Standard Industrial Classification (SIC) Code: 4911 SIC Name: Electric Services

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

A description of the facility/area process description;

A basis for applying permit shields;

A list of the federal regulatory applicability determinations;

A table listing the determination of applicable requirements;

A list of the New Source Review Requirements;

The rationale for periodic monitoring methods selected;

The rationale for compliance assurance methods selected:

A compliance status; and

A list of available unit attribute forms.

Prepared on: September 29, 2016

Operating Permit Basis of Determination

Permit Area Process Description

Oklaunion Power Station uses one coal fired boiler to produce electricity. Boiler #1 began operation in 1986 and is authorized by permit 9015/PSDTX352M2. The flue gas and fly ash from the boiler are directed to an electrostatic precipitator (ESP) for particulate matter removal and subsequently through a limestone fuel gas desulfurization (FGD) wet scrubber for removal of sulfur. Activated carbon and calcium bromide are used to control mercury.

In addition to coal, the boiler is authorized to burn No 2 fuel oil for purposes of startup and flame stabilization as well as when mixed with soil or cat litter.

Coal is received at the site by rail car and transferred to active and inactive storage piles by use of Transfer Tower No. 1. Coal is transferred from storage to the boiler through Transfer Towers No. 2 and No. 3, storage bins, and a pulverizer.

Limestone for use in the FGD system is brought in by truck and transferred to active/inactive storage areas. The limestone is transferred from the bins to a wet mill where it is mixed with water to form a wet slurry. The wet slurry is then transferred to the FGD system.

The flue gas flows directly from the FGD system to the stack (EPN 1).

FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	SO2, PM, NOX, HAPS, CO
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Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions

- Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
- Additional Monitoring Requirements
- o New Source Review Authorization Requirements
- o Compliance Requirements
- Protection of Stratosphere Ozone
- o Permit Location
- o Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - o Alternative Requirements
- Appendix A
 - Acronym list
- Appendix B
 - Copies of major NSR authorizations

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number,"

detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3. A. for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions

All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents are listed in the Determination of Applicable Requirements table.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	Yes
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes

CSAPR (Cross-State Air Pollution Rule) TR (Transport Rule) Trading Program	Yes
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Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Acid Rain Permit

The permitted area is subject to Federal Clean Air Act Title IV Acid Rain rules for Phase II units, as codified in 40 CFR Parts 72 through 78, because it meets the definition of "affected source." Applicability of affected sources are defined in 40 CFR § 72.6 and include those sources that burn fossil fuel, and generates electricity for sale. Under 40 CFR Part 72, incorporated by reference into 30 TAC Chapter 122, all acid rain permits must contain specific terms and conditions, including monitoring, reporting, recordkeeping and excess emission requirements, established by the U.S. EPA. The Title IV permitting procedures are described within 30 TAC Chapter 122, Subchapter E. The applicable requirements of the Acid Rain Permit are contained in the Special Terms and Conditions of the FOP. The Acid Rain permit is effective as of the date of the issuance of the FOP and has a term ending in concurrence with the FOP.

Cross-State Air Pollution Rule (CSAPR) Transport Rule (TR) Trading Program Requirements

The Cross-State Air Pollution Rule (CSAPR) Transport Rule (TR) Trading Program was established to mitigate the interstate transport of NOx and SO2 which contribute to the formation of fine particles (PM 2.5) and ground-level ozone. The EPA has promulgated a model cap and trade program in 40 CFR Part 97 to implement CSAPR TR. This rule will be adopted by reference into 30 TAC Chapter 122, as part of a pending rulemaking (Rule Project No. 2016-012-122-AI), which will include the repeal of 30 TAC Chapter 122, Subchapter E, Division 2: Clean Air Interstate Rule.

The permitted area is subject to CSAPR TR as it contains units that meet the definition of a NOx budget unit in 40 CFR § 97.4(a)(1)-(2) and a CSAPR TR SO2 unit in 40 CFR § 96.704(a)(1)-(2). The applicable requirements of the CSAPR TR Trading Programs are contained in the Special Terms and Conditions of the FOP.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

- 1. Office activities such as photocopying, blueprint copying, and photographic processes.
- 2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
- 3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
- 4. Outdoor barbecue pits, campfires, and fireplaces.
- 5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
- 6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.

- 7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
- 8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
- 9. Vehicle exhaust from maintenance or repair shops.
- 10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- 11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- 12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
- 13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 15. Well cellars.
- 16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- 17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
- 18. Equipment used exclusively for the melting or application of wax.
- 19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
- 20. Shell core and shell mold manufacturing machines.
- 21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
- 22. Equipment used for inspection of metal products.
- 23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
- 24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
- 25. Battery recharging areas.
- 26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at

www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
EDG	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-6640	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Nonindustrial Emergency Engine = Stationary RICE is defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.
			Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).
EFP	40 CFR Part 60,	60IIII-4219	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after July 11, 2005.
	Subpart IIII		Diesel = Diesel fuel is used.
			Kilowatts = Power rating is greater than or equal to 130 KW and less than or equal to 368 KW.
			Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.
			Displacement = Displacement is greater than or equal to 10 and less than 15 liters per cylinder.
			Service = CI ICE is a fire-pump engine, an emergency engine certified to National Fire Protection Association requirements.
			Standards = The emergency CI ICE meets the standards applicable to non-emergency engines.
			Commencing = CI ICE that is commencing new construction.
			Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions.
			Manufacture Date = Date of manufacture is after 07/01/2006.
			Model Year = CI ICE was manufactured in model year 2009.
			Options = The CI ICE rated speed is less than 2650 RPMs.
EFP	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-6640	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.
			Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.
			Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).
OPS1	30 TAC Chapter 111, Nonagricultural Processes	R1153-1	Source Type = Solid fossil fuel-fired steam generator.
OPS1	30 TAC Chapter	R200-1	Fuel Type = Solid fossil fuel.
	112, Sulfur		Heat Input = Design heat input is greater than 1500 MMBtu/hr.
	Compounds		Control Equipment = Unit equipped with SO ₂ control equipment.
			FCAA § 412(c) = The unit is subject to the Federal Clean Air Act § 412(c) [FCAA § 412(c)] as amended in 1990.

Unit ID	Regulation	Index Number	Basis of Determination*
OPS1	30 TAC Chapter	R200-2	Fuel Type = Liquid fuel.
	112, Sulfur Compounds		Heat Input = Design heat input is greater than 250 MMBtu/hr.
	Compounds		Control Equipment = Unit equipped with SO_2 control equipment.
			FCAA § 412(c) = The unit is subject to the Federal Clean Air Act § 412(c) [FCAA § 412(c)] as amended in 1990.
			Stack Height = The effective stack height is at least the standard effective stack height for each stack to which the unit routes emissions.
OPS1	40 CFR Part 60,	60Da-1	Construction/Modification Date = AFTER SEPTEMBER 18, 1978 AND ON OR BEFORE JULY 9, 1997
	Subpart Da		Fuel Pretreatment = Fuel pretreatment credit is not claimed.
			Combined Cycle System = The unit is not used in conjunction with an electric utility combined cycle gas turbine not designed to burn fuels containing 50 percent (by heat input) or more solid derived fuel not meeting the definition of natural gas.
			Heat Input of Fossil Fuel = Heat input of fossil fuel is greater than 250 MMBtu/hr (73 MW).
			Unit Type = Not a resource recovery unit.
			D-Series Fuel Type #1 = Solid fossil fuel.
			Opacity Monitoring Type = Continuous monitoring system for opacity (COMS).
			SO2 Monitoring Type = Continuous emission monitoring system [§ 60.49Da(b)(1) or (b)(2)].
			Changes to Existing Affected Facility = Changes have not been made to the existing fossil fuel-fired steam generating unit, which was not previously subject to 40 CFR Part 60, Subpart Da, to accommodate the use of fuels not previously fired.
			NOx Monitoring Type = Continuous emission monitoring system installed to meet the requirements of Part 75.
			% Coal Refuse = The facility burns less than 75% coal refuse on a 12-month rolling average basis.
			Commercial Demonstration Permit = The EPA Administrator has not issued a commercial demonstration permit (CDP).
			Combined Cycle Type = Not a combined cycle gas turbine.
			SO2 Emission Rate = SO ₂ emission rate is greater than or equal to 0.20 lb/MMBtu (86 ng/J) heat input but less than or equal to 0.60 lb/MMBtu (260 ng/J) heat input.
			FGD = The facility has a flue gas desulfurization system.

Unit ID	Regulation	Index Number	Basis of Determination*
OPS1	40 CFR Part 60,	60Da-2	Construction/Modification Date = AFTER SEPTEMBER 18, 1978 AND ON OR BEFORE JULY 9, 1997
	Subpart Da		Fuel Pretreatment = Fuel pretreatment credit is not claimed.
			Combined Cycle System = The unit is not used in conjunction with an electric utility combined cycle gas turbine not designed to burn fuels containing 50 percent (by heat input) or more solid derived fuel not meeting the definition of natural gas.
			Heat Input of Fossil Fuel = Heat input of fossil fuel is greater than 250 MMBtu/hr (73 MW).
			Unit Type = Not a resource recovery unit.
			D-Series Fuel Type #1 = Solid fossil fuel.
			D-Series Fuel Type #2 = Liquid fossil fuel.
			Opacity Monitoring Type = Continuous monitoring system for opacity (COMS).
			SO2 Monitoring Type = Continuous emission monitoring system [§ 60.49Da(b)(1) or (b)(2)].
			Changes to Existing Affected Facility = Changes have not been made to the existing fossil fuel-fired steam generating unit, which was not previously subject to 40 CFR Part 60, Subpart Da, to accommodate the use of fuels not previously fired.
			NOx Monitoring Type = Continuous emission monitoring system installed to meet the requirements of Part 75.
			% Coal Refuse = The facility burns less than 75% coal refuse on a 12-month rolling average basis.
			Commercial Demonstration Permit = The EPA Administrator has not issued a commercial demonstration permit (CDP).
			Combined Cycle Type = Not a combined cycle gas turbine.
			SO2 Emission Rate = SO ₂ emission rate is greater than or equal to 0.20 lb/MMBtu (86 ng/J) heat input but less than or equal to 0.60 lb/MMBtu (260 ng/J) heat input.
			FGD = The facility has a flue gas desulfurization system.
OPS1	40 CFR Part 63, Subpart UUUUU	63UUUUU-1	Unit Type = Unit is a coal-fired electric utility steam generating unit as defined in 40 CFR § 63.10042. Fuel Type = Coal
	-		17
OPS1	40 CFR Part 63, Subpart UUUUU	63UUUUU-2	Unit Type = Unit is a coal-fired electric utility steam generating unit as defined in 40 CFR § 63.10042.
	Subpart 00000		Fuel Type = Fuel Oil
01001	40 CFR Part 60, Subpart Y	60Y-1	Coal Preparation Plant = Coal preparation plant contains thermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), coal storage systems or coal transfer and loading systems.
			Design Capacity = Design capacity is greater than 200 tons of coal per day.
			Federally Enforceable Limit Option = The plant chooses not to operate under a
			federally enforceable limit of less than 200 tons per day.
			Affected Facility = Coal processing and conveying equipment (including breakers and crushers), coal storage
			systems (excluding open storage piles), or coal transfer and loading systems.
			Covered Under Another Subpart = Thermal dryers are subject to 40 CFR Part 60, Subpart Y requirements.
			Construction/Reconstruction/Modification Date = After October 24, 1974 and before April 28, 2008.

Unit ID	Regulation	Index Number	Basis of Determination*
01011	40 CFR Part 60, Subpart Y	60Y-1	Coal Preparation Plant = Coal preparation plant contains thermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), coal storage systems or coal transfer and loading systems.
			Design Capacity = Design capacity is greater than 200 tons of coal per day.
			Federally Enforceable Limit Option = The plant chooses not to operate under a
			federally enforceable limit of less than 200 tons per day.
			Affected Facility = Coal processing and conveying equipment (including breakers and crushers), coal storage
			systems (excluding open storage piles), or coal transfer and loading systems.
			Covered Under Another Subpart = Thermal dryers are subject to 40 CFR Part 60, Subpart Y requirements.
			Construction/Reconstruction/Modification Date = After October 24, 1974 and before April 28, 2008.
01012	40 CFR Part 60, Subpart Y	60Y-1	Coal Preparation Plant = Coal preparation plant contains thermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), coal storage systems or coal transfer and loading systems.
			Design Capacity = Design capacity is greater than 200 tons of coal per day.
			Federally Enforceable Limit Option = The plant chooses not to operate under a
			federally enforceable limit of less than 200 tons per day.
			Affected Facility = Coal processing and conveying equipment (including breakers and crushers), coal storage
			systems (excluding open storage piles), or coal transfer and loading systems.
			Covered Under Another Subpart = Thermal dryers are subject to 40 CFR Part 60, Subpart Y requirements.
			Construction/Reconstruction/Modification Date = After October 24, 1974 and before April 28, 2008.
01005	40 CFR Part 60,	60000-1	Plant Type = Crushed stone plant.
	Subpart OOO		Portable or Fixed Plant = Fixed.
			Plant Capacity = Capacity is greater than 25 tons/hr.
			Underground Mines = The facility is not located in an underground mine.
			Subpart Applicability = The facility is not subject to 40 CFR Part 60, Subparts F or I, nor does the facility follow, in the plant process, another facility subject to Subparts F or I.
			Facility Type = Transfer point on a belt conveyor not processing saturated material.
			Construction/Modification Date = On or before August 31, 1983.
01006	40 CFR Part 60,	60000-1	Plant Type = Crushed stone plant.
	Subpart OOO		Portable or Fixed Plant = Fixed.
			Plant Capacity = Capacity is greater than 25 tons/hr.
			Underground Mines = The facility is not located in an underground mine.
			Subpart Applicability = The facility is not subject to 40 CFR Part 60, Subparts F or I, nor does the facility follow, in the plant process, another facility subject to Subparts F or I.
			Facility Type = Grinding mill.
			Construction/Modification Date = On or before August 31, 1983.

Unit ID	Regulation	Index Number	Basis of Determination*
01009	40 CFR Part 60,	60OOO-1	Plant Type = Crushed stone plant.
	Subpart OOO	Portable or Fixed Plant = Fixed.	
			Plant Capacity = Capacity is greater than 25 tons/hr.
			Underground Mines = The facility is not located in an underground mine.
			Subpart Applicability = The facility is not subject to 40 CFR Part 60, Subparts F or I, nor does the facility follow, in the plant process, another facility subject to Subparts F or I.
			Facility Type = Bucket elevator not processing saturated material.
			Construction/Modification Date = On or before August 31, 1983.
01010	40 CFR Part 60,	60000-1	Plant Type = Crushed stone plant.
	Subpart OOO		Portable or Fixed Plant = Fixed.
			Plant Capacity = Capacity is greater than 25 tons/hr
			Underground Mines = The facility is not located in an underground mine.
			Subpart Applicability = The facility is not subject to 40 CFR Part 60, Subparts F or I, nor does the facility follow, in the plant process, another facility subject to Subparts F or I.
			Facility Type = Transfer point on a belt conveyor not processing saturated material.
			Construction/Modification Date = On or before August 31, 1983.
1	30 TAC Chapter		Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.
	111, Visible Emissions		Annual ACF = Annual average capacity factor is greater than 30%, as reported to the Federal Power Commission for calendar year 1974
			Heat Input = Heat Input is greater than 250 MMBtu/hr.
			Vent Source = The source of the vent is a steam generator fired by solid fossil fuel.
			Opacity Monitoring System = A continuous emissions monitoring system (CEMS) capable of measuring the opacity of emissions is installed in the vent in accordance with 30 TAC § 111.111(a)(1)(C).
			Construction Date = After January 31, 1972
			Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.
1	30 TAC Chapter	, Visible	Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.
	111, Visible Emissions		SIP Violation = The source is able to comply with applicable PM and opacity regulations without the use of PM collection equipment and has not been found to be in violation of any visible emission standard in a State Implementation Plan.
			Vent Source = The source of the vent is a steam generator that burns oil or a mixture of oil and gas.
			Opacity Monitoring System = A continuous emissions monitoring system (CEMS) capable of measuring the opacity of emissions is installed in the vent in accordance with 30 TAC § 111.111(a)(1)(C).
			Construction Date = After January 31, 1972
			Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.

^{* -} The "unit attributes" or operating conditions that determine what requirements apply

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification	For initial permit with application shield, can be issued
of an existing facility	after operation commences; significant revisions require
	approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not
	authorize new emissions
Ensures issued permits are protective of the	Applicable requirements listed in permit are used by
environment and human health by conducting a	the inspectors to ensure proper operation of the site as
health effects review and that requirement for	authorized. Ensures that adequate monitoring is in
best available control technology (BACT) is	place to allow compliance determination with the FOP.
implemented.	
Up to two Public notices may be required.	One public notice required. Opportunity for public
Opportunity for public comment and contested	comments. No contested case hearings.
case hearings for some authorizations.	
Applies to all point source emissions in the state.	Applies to all major sources and some non-major
	sources identified by the EPA.
Applies to facilities: a portion of site or	One or multiple FOPs cover the entire site (consists of
individual emission sources	multiple facilities)
Permits include terms and conditions under	Permits include terms and conditions that specify the
which the applicant must construct and operate	general operational requirements of the site; and also
its various equipment and processes on a facility	include codification of all applicable requirements for
basis.	emission units at the site.
Opportunity for EPA review for Federal	Opportunity for EPA review, Affected states review, and
Prevention of Significant Deterioration (PSD) and	a Public petition period for every FOP.
Nonattainment (NA) permits for major sources.	
Permits have a table listing maximum emission	Permit has an applicable requirements table and
limits for pollutants	Periodic Monitoring (PM) / Compliance Assurance
	Monitoring (CAM) tables which document applicable
	monitoring requirements.
Permits can be altered or amended upon	Permits can be revised through several revision
application by company. Permits must be issued	processes, which provide for different levels of public
before construction or modification of facilities	notice and opportunity to comment. Changes that
can begin.	would be significant revisions require that a revised
NOD 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	permit be issued before those changes can be operated.
NSR permits are issued independent of FOP	FOP are independent of NSR permits, but contain a list
requirements.	of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

 $www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106 list/index106.html$

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air_status_permits.html

Prevention of Significant Deterioration (PSD) Permits			
PSD Permit No.: PSDTX325M2	Issuance Date: 02/11/2014		
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.			
Authorization No.: 112550	Issuance Date: 12/23/2013		
Authorization No.: 9015	Issuance Date: 02/11/2014		
Permits By Rule (30 TAC Chapter 106) for	the Application Area		
Number: 106.227	Version No./Date: 09/04/2000		
Number: 106.263	Version No./Date: 11/01/2001		
Number: 106.265	Version No./Date: 09/04/2000		
Number: 106.371	Version No./Date: 09/04/2000		
Number: 106.412	Version No./Date: 09/04/2000		
Number: 106.454	Version No./Date: 11/01/2001		
Number: 106.472	Version No./Date: 09/04/2000		
Number: 106.473	Version No./Date: 09/04/2000		
Number: 106.511	Version No./Date: 09/04/2000		
Number: 106.532	Version No./Date: 09/04/2000		
Number: 75	Version No./Date: 11/25/1985		

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated

with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

- 1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
- 2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
- 3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information				
ID No.: OPS1				
Control Device ID No.: ESP-1	Control Device Type: Wet or Dry Electrostatic Precipitator			
Applicable Regulatory Requirement				
Name: 30 TAC Chapter 111, Nonagricultural Processes	SOP Index No.: R1153-1			
Pollutant: PM	Main Standard: § 111.153(b)			
Monitoring Information				
Indicator: Opacity				
Minimum Frequency: six times per minute				
Averaging Period: six-minute				

Basis of CAM: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR \S 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Deviation Limit: It shall be considered a deviation if the opacity exceeds 20%.

Unit/Group/Process Information				
ID No.: OPS1				
Control Device ID No.: ESP-1 Control Device Type: Wet or Dry Electrostatic Precipitator				
Applicable Regulatory Requirement				
Name: 40 CFR Part 60, Subpart Da	SOP Index No.: 60Da-1			
Pollutant: PM	Main Standard: § 60.40Da(a)			
Monitoring Information				
Indicator: Opacity				

Averaging Period: six-minute

Minimum Frequency: six times per minute

Deviation Limit: It shall be considered a deviation if visible emissions are observed or if the result of Test Method 9 is that opacity is greater than 20%.

Basis of CAM: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Unit/Group/Process Information		
ID No.: OPS1		
Control Device ID No.: ESP-1	Control Device Type: Wet or Dry Electrostatic Precipitator	
Applicable Regulatory Requirement		
Name: 40 CFR Part 60, Subpart Da	SOP Index No.: 60Da-2	
Pollutant: PM	Main Standard: § 60.40Da(a)	
Monitoring Information		
Indicator: Opacity		

Averaging Period: six-minute

Minimum Frequency: six times per minute

Deviation Limit: It shall be considered a deviation if visible emissions are observed or if the result of Test Method 9 is that opacity is greater than 20%.

Basis of CAM: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information			
ID No.: 01001			
Control Device ID No.: N/A	Control Device Type: N/A		
Applicable Regulatory Requirement			
Name: 40 CFR Part 60, Subpart Y	SOP Index No.: 60Y-1		
Pollutant: PM (OPACITY)	Main Standard: § 60.254(a)		
Monitoring Information			
Indicator: Opacity			
Minimum Frequency: Once per month			
Averaging Period: Six-minutes			
Deviation Limit: It shall be considered a deviation if the opacity exceeds 20%.			

Basis of monitoring:

The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Unit/Group/Process Information		
ID No.: 01011		
Control Device ID No.: N/A	Control Device Type: N/A	
Applicable Regulatory Requirement		
Name: 40 CFR Part 60, Subpart Y	SOP Index No.: 60Y-1	
Pollutant: PM (OPACITY)	Main Standard: § 60.254(a)	
Monitoring Information		

Indicator: Opacity

Minimum Frequency: Once per month

Averaging Period: Six-minutes

Deviation Limit: It shall be considered a deviation if the opacity exceeds 20%.

Basis of monitoring:

The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Unit/Group/Process Information		
ID No.: 01012		
Control Device ID No.: N/A	Control Device Type: N/A	
Applicable Regulatory Requirement		
Name: 40 CFR Part 60, Subpart Y	SOP Index No.: 60Y-1	
Pollutant: PM (OPACITY)	Main Standard: § 60.254(a)	
Monitoring Information		

Indicator: Opacity

Minimum Frequency: Once per month

Averaging Period: Six-minutes

Deviation Limit: It shall be considered a deviation if the opacity exceeds 20%.

Basis of monitoring:

The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Compliance Review 1. In accordance with 20 TAC Chapter 60, the compliance history was reviewed on Sentember 22.	2015
1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on <u>September 22, Site rating: 0.00 / High</u> Company rating: <u>0.00 / High</u>	<u> 2013.</u>
(High < 0.10 ; Satisfactory ≥ 0.10 and ≤ 55 ; Unsatisfactory > 55)	
2. Has the permit changed on the basis of the compliance history or site/company rating?	No
2. Has the permit changed on the basis of the comphance history of site/company rating:	110
Site/Permit Area Compliance Status Review	
1. Were there any out-of-compliance units listed on Form OP-ACPS?	No
2. Is a compliance plan and schedule included in the permit?	No
Available Unit Attribute Forms	
OP-UA1 - Miscellaneous and Generic Unit Attributes	
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes	
OP-UA3 - Storage Tank/Vessel Attributes	
OP-UA4 - Loading/Unloading Operations Attributes	
OP-UA5 - Process Heater/Furnace Attributes	
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes	
OP-UA7 - Flare Attributes	
OP-UA8 - Coal Preparation Plant Attributes	
OP-UA9 - Nonmetallic Mineral Process Plant Attributes	
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes OP-UA11 - Stationary Turbine Attributes	
OP-UA11 - Stationary Turbine Attributes OP-UA12 - Fugitive Emission Unit Attributes	
OP-UA13 - Industrial Process Cooling Tower Attributes	
OP-UA14 - Water Separator Attributes	
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes	
OP-UA16 - Solvent Degreasing Machine Attributes	
OP-UA17 - Distillation Unit Attributes	
OP-UA18 - Surface Coating Operations Attributes	
OP-UA19 - Wastewater Unit Attributes	
OP-UA20 - Asphalt Operations Attributes	
OP-UA21 - Grain Elevator Attributes	
OP-UA22 - Printing Attributes	
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes	
OP-UA25 - Synthetic Fiber Production Attributes	
OP-UA26 - Electroplating and Anodizing Unit Attributes	
OP-UA27 - Nitric Acid Manufacturing Attributes	
OP-UA28 - Polymer Manufacturing Attributes OP-UA29 - Glass Manufacturing Unit Attributes	
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes	
OP-UA31 - Lead Smelting Attributes	
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes	
OP-UA33 - Metallic Mineral Processing Plant Attributes	
OP-UA34 - Pharmaceutical Manufacturing	
OP-UA35 - Incinerator Attributes	
OP-UA36 - Steel Plant Unit Attributes	
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes	
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes	
OP-UA39 - Sterilization Source Attributes	
OP-UA40 - Ferroalloy Production Facility Attributes	
OP-UA41 - Dry Cleaning Facility Attributes	
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes	
OP-UA43 - Sulfuric Acid Production Attributes	
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes	

- OP-UA45 Surface Impoundment Attributes
- OP-UA46 Epoxy Resins and Non-Nylon Polyamides Production Attributes
- OP-UA47 Ship Building and Ship Repair Unit Attributes
- OP-UA48 Air Oxidation Unit Process Attributes
- OP-UA49 Vacuum-Producing System Attributes
- OP-UA50 Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur
- **Recovery Plant Attributes**
- OP-UA51 Dryer/Kiln/Oven Attributes
- OP-UA52 Closed Vent Systems and Control Devices
- OP-UA53 Beryllium Processing Attributes
- OP-UA54 Mercury Chlor-Alkali Cell Attributes
- OP-UA55 Transfer System Attributes
- OP-UA56 Vinyl Chloride Process Attributes
- OP-UA57 Cleaning/Depainting Operation Attributes
- OP-UA58 Treatment Process Attributes
- OP-UA59 Coke By-Product Recovery Plant Attributes
- OP-UA60 Chemical Manufacturing Process Unit Attributes
- OP-UA61 Pulp, Paper, or Paperboard Producing Process Attributes
- OP-UA62 Glycol Dehydration Unit Attributes
- OP-UA63 Vegetable Oil Production Attributes